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Attorney for Creditors, Loel F. Polley, Carroll K. Beaver,
George A Peavy, and Gary M. Hunt

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

In re

Case No. 07-30041-B-7

RANDALL CHAMBERS AND
CINDY CHAMBERS,

MC. No. GAR-002

MOTION FOR ORDER FOR
TRUSTEE TO ABANDON
PROPERTY

Debtor(s).

DATE: March 16, 2010
TIME: 9:32 a.m.
PLACE: Department B
501 I Street, Courtroom 33
Sacramento, CA 95814
Honorable Thomas C. Holman

Moving parties Loel F. Polley, Carroll K. Beaver, George A. Peavy, and Gary M. Hunt
are secured creditors in the above-captioned bankruptcy estate.

These creditors are secured by a promissory note and deed of trust recorded against real
property whose legal description is contained in Exhibit A to this motion. Exhibit A is
incorporated by reference. A copy of the deed of trust with assignments of rents is attached and
marked as Exhibit B to this motion.

A discharge has been granted ending the automatic stay as it applies to debtors.

The Chapter 7 estate is not yet closed. Trustee, Michael Dacquisto has determined that
the subject real property has no equity and is of no value to the estate. A copy of an August 11,

MOTION FOR ORDER FOR TRUSTEE TO ABANDON PROPERTY

1 2009 letter from Mr. Dacquist is attached and marked as Exhibit C to this motion.

2 Because the property is of no value to the estate, moving parties respectfully request this
3 court to issue an order for the trustee to abandon the subject real property which is described in
4 Exhibit A to this motion.

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8 Dated: February 16, 2010

/s/George A. Roberts

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George A. Roberts
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